

KEYA C. DENNER, ESQ.

NORRIS McLAUGHLIN & MARCUS, P.A.

Route 202-206, Suite 200

Bridgewater, NJ 08807-5933

(908) 722-0700

Attorneys for Plaintiffs, Robert Gregory,

Samuel Gregory and Christopher Gregory

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ROBERT GREGORY, SAMUEL
GREGORY, and CHRISTOPHER
GREGORY,

Plaintiffs,

v.

W. PATRIC GREGORY III,

Defendant,

ELECTRONICALLY FILED

Civil Action No.: 2:15-cv-00320(WHW)(CLW)

**NOTICE OF MOTION COMPELLING
PRODUCTION OF DOCUMENTS AND
COMPLIANCE WITH THIRD-PARTY
SUBPOENAS**

TO: Laurence B. Orloff, Esq.
Orloff, Lowenbach, Stifelman & Siegel, P.A.
101 Eisenhower Parkway, Suite 400
Roseland, New Jersey 07068-1097

-and-

Michael S. Haratz, Esq.
Haratz Law LLC
50 Division Street, Suite 501
Somerville, New Jersey 08876
Attorneys for Defendant

Bruce H. Matson, Esq.
Chief Legal Officer
LeClair Ryan
919 East Main Street
Twenty-Fourth Floor
Richmond, VA 23219

Joseph Cipolla, CPA
Cipolla & Co., LLC
851 Franklin Lakes Road
Franklin Lakes, NJ 07417

SIRS:

PLEASE TAKE NOTICE that on Monday, May 2, 2016, at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for Plaintiffs Robert Gregory, Samuel Gregory, and Christopher Gregory ("Plaintiffs"), shall move, pursuant to Fed. R. Civ. P. 37 and 45, before the United States District Court for the District of New Jersey (Hon. Cathy L. Waldor, U.S.M.J.), at the Martin Luther King, Jr. Federal Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order compelling: (1) the production of documents pursuant to Fed. R. Civ. P. 37; and (2) compliance with subpoenas pursuant to Fed. R. Civ. P. 45.

PLEASE TAKE FURTHER NOTICE that in support of said motion, Plaintiffs shall rely upon the Declaration of Keya C. Denner, Esq. and Brief submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby waive oral argument unless opposing papers are timely filed and served.

A proposed form of Order is submitted herewith.

NORRIS, McLAUGHLIN & MARCUS, P.A.
*Attorneys for Plaintiffs, Robert Gregory,
Samuel Gregory and Christopher Gregory*

By: /s/ Keya C. Denner
KEYA C. DENNER

Dated: April 8, 2016

CERTIFICATION OF SERVICE

I hereby certify that on today's date, copies of the within motion papers were served, via the Court's electronic filing system, upon:

Laurence B. Orloff, Esq.
Orloff, Lowenbach, Stifelman & Siegel
101 Eisenhower Parkway
Roseland, New Jersey 07068-1097
Attorneys for Plaintiffs

Michael S. Haratz, Esq.
LeClairRyan
One Riverfront Plaza
1037 Raymond Boulevard, 16th Floor
Newark, New Jersey 07102
Attorneys for Plaintiffs

I hereby certify that on today's date, copies of the within motion papers were sent by regular mail to:

Bruce H. Matson, Esq.
Chief Legal Officer
LeClair Ryan
919 East Main Street
Twenty-Fourth Floor
Richmond, VA 23219

Joseph Cipolla, CPA
Cipolla & Co., LLC
851 Franklin Lakes Road
Franklin Lakes, NJ 07417

I hereby certify that the foregoing statement made by me is true. I am aware that if the foregoing statement is willfully false, I am subject to punishment.

/s/ Keya C. Denner
KEYA C. DENNER

Dated: April 8, 2016